

EXHIBIT 72

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE
CENTRE GMBH and WEST PUBLISHING
CORPORATION,

Plaintiffs/Counterdefendants,

vs. C.A. No. 20-613-LPS

ROSS INTELLIGENCE, INC.,
Defendant/Counterclaimant.

HIGHLY CONFIDENTIAL
PURSUANT TO PROTECTIVE ORDER

VIDEOTAPED AND VIDEOCONFERENCE
DEPOSITION OF TERI WHITEHEAD

Monday, April 18, 2022

Reported by:

Denise M. Kizy, RPR, CRR, CSR-2466

JOB NO. 208941

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April 18, 2022

9:04 a.m.

Deposition of TERI WHITEHEAD, held
via videoconference, before Denise M. Kizy,
RPR, CRR, CSR-2466, a Notary Public of the
State of Michigan.

1 APPEARANCES:

2
3 Kirkland & Ellis LLP

4 Attorneys for Plaintiffs/Counterdefendants

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6 New York, New York 10022

7 BY: JOSHUA SIMMONS, ESQ.

8 JENNIFER GIBBINS, ESQ.

9
10 Crowell & Moring LLP

11 Attorneys for Defendant/Counterclaimant

12 3 Embarcadero Center

13 San Francisco, California 94111

14 BY: WARRINGTON PARKER, ESQ.

15 CRINESHA BERRY, ESQ.

16
17
18
19
20
21
22 ALSO PRESENT:

23 Brandon Vosburgh - Video Technician

24 Alexandra Teves - Exhibit Operator

25

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1 TERI WHITEHEAD

2 VIDEO TECHNICIAN: Good morning. My
3 name is Brandon Vosburgh. I'm the legal
4 videographer in association with TSG
5 Reporting, Incorporated.

6 Due to the severity of COVID-19 and
7 following the practice of social
8 distancing, I will not be in the same room
9 with the witness; instead, I will record
10 this deposition remotely.

11 Our certified court stenographer,
12 Denise Kizy, will also be in a separate
13 room and will swear in the witness
14 remotely.

15 Do all the parties stipulate to the
16 validity of this video recording and remote
17 swearing, and that it will be admissible in
18 the courtroom as if it had been taken
19 following Rule 30 of the Federal Rules of
20 Civil Procedures and the state's rules
21 where this case is pending?

22 Your answers, please.

23 MR. PARKER: Yes.

24 MR. SIMMONS: It's okay from the
25 plaintiff's perspective as well.

1 TERI WHITEHEAD

2 VIDEO TECHNICIAN: Thank you for
3 your answers.

4 Today is Monday, April 18, 2022, and
5 the time is 9:05 a.m. Eastern Standard
6 Time.

7 This is media unit number one of the
8 video-recorded deposition of Teri Whitehead
9 in the matter of Thomson Reuters Enterprise
10 Centre GmbH, et al. versus ROSS
11 Intelligence, Incorporated.

12 Will counsel please identify
13 yourselves for the record and then we'll
14 have our court stenographer swear in the
15 witness.

16 THE COURT REPORTER: Counsel, please
17 identify yourselves.

18 MR. PARKER: This is Warrington
19 Parker appearing on behalf of ROSS
20 Intelligence, defendants in the case. With
21 me is Crinesha Berry.

22 MR. SIMMONS: My name is Joshua
23 Simmons. With me is Jennifer Gibbins.
24 We're from Kirkland & Ellis representing
25 the plaintiffs.

1 TERI WHITEHEAD

2 MR. PARKER: Good morning, Ms.

3 Whitehead. How are you?

4 THE COURT REPORTER: Excuse me,

5 excuse me.

6 Ms. Whitehead, would you raise your
7 right hand, please.

8 TERI WHITEHEAD

9 was thereupon called as a witness herein,
10 and after having been first duly sworn to
11 testify to the truth, the whole truth and
12 nothing but the truth, was examined and
13 testified as follows:

14 EXAMINATION

15 BY MR. PARKER:

16 Q. Well, good morning. Now you're
17 placed under oath and you can really say good
18 morning I reckon. How are you?

19 A. Good. Thanks.

20 Q. Good. I apologize. I'm in San
21 Francisco. The back lighting is poor and it's
22 still dark, but it will get lighter as the day
23 goes on, so I won't look quite as mysterious.

24 You understand you've been placed
25 under oath; yes?

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TERI WHITEHEAD

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1 TERI WHITEHEAD

2 CERTIFICATE

3
4 STATE OF MICHIGAN)

5) ss.


6 COUNTY OF OAKLAND)

7
8 I, Denise M. Kizy, a Notary Public
9 within and for the State of Michigan, do
10 hereby certify:

11 That TERI WHITEHEAD, the deponent
12 whose deposition is hereinbefore set forth,
13 was duly sworn by me and that such
14 deposition is a true record of the
15 testimony given by such witness.

16 I further certify that I am not
17 related to any of the parties to this
18 action by blood or marriage; and that I am
19 in no way interested in the outcome of this
20 matter.

21 IN WITNESS WHEREOF, I have hereunto
22 set my hand April 28, 2022.

23 

24 _____
25 Denise M. Kizy, RPR, CRR, CSR-2466